

Sonoma County Community Development Commission

Sonoma County Housing Authority 1440 Guerneville Road, Santa Rosa, CA 95403-4107

PILOT PROJECT TO SAFELY SHELTER HOMELESS PEOPLE RFP

QUESTIONS AND ANSWERS

FEBRUARY 12, 2016

Shirlee Zane

Vice Chair

Members of the Commission Efren Carrillo

David Rabbitt James Gore Susan Gorin

Kathleen H. Kane Executive Director

Typically as a government pilot project with use on government property, City design review would not be required.		Question (verbatim from applicants)	Answer	Department Or Agency Response
	1.	Any reason why the Tiny Home project on County property would be required to go through design review	Typically as a government pilot project with use on government property, City design review would not be required. Pursuant to California Government Code Section 53090, cities and counties are mutually exempt from each other's building and zoning ordinances, whether they are acting in a governmental or proprietary capacity on their own properties. See 40 Op. Atty. Gen. 243 (1962). There is an exception, however, in situations where a city or county leases out their land for use solely for the private purposes of the developer. See 68 Op. Cal. Atty. Gen. 114 (1985). In such cases, city or county zoning and building ordinances would apply to the private development. Based on the scope of information currently available, the City has determined that land use jurisdiction for this project would most appropriately remain with the County. The RFP anticipates only a temporary use of the site at no charge, and does not anticipate a permanent transfer or development of the site. Further, the purposes of the piolet project would serve the County's interest in reducing homelessness by providing temporary shelters at the site. This position appears to be consistent with the County's analysis of the issue. In the event that the scope of the proposed project changes, the City would need	<u>-</u>





		Given that the land use questions would thus fall within the purview of the County, the City feels no need to respond to individual questions related to planning and zoning for the site. As a separate matter, the City has provided detailed analysis regarding water and sewer alternatives applicable to the proposed project.	
2.	For the sewer there are three options if we hook into the city system. Are all three of these options feasible? a. From the center of the parcel to the sewer connection on administration drive it is 540'. Per code, over 300', a 6" main sewer line will be required. i. Excavate and install sewer with a pumping station and road crossing work will cost about ±\$50-75,000. ii. Sewer Connection Fees; will require connection fees of \$65-70,000. b. We might be able to pump the sewer up to the connection used by the Probation / park & maintenance department trailers. i. Excavate, and installation will cost ±\$5-10,000 ii. Sewer Connection Fees; will require connection fees of \$65-70,000. c. We might be able to connect in with the sewer from the day care center. i. Excavation and installation will cost ±\$15-20,000 ii. Sewer Connection Fees; will require connection fees of \$65-70,000.	TBD	Community development Commission
3.	If we assume that each occupant will shower (10 gal), toilet (10 gal), wash hands and dishes (10 gal), and laundry (10 gal) per day, that is 40 gal/day/person, say 1,000 gal/day if they are economical, 1,250 if they are not. a. We could install a 5,000-gallon sewage storage tank on site, pump into it and empty it on a regular basis. (\$10,000 initial cost and pumping (every 4 days, 182 times in two years) at an approximate cost of \$250,000)	PRMD did an estimate based on 50 gals per day (Env. Health figure) with an assumption of 1.5 persons per and the approximate cost was \$250.000 per year. PRMD will look at sewage holding tanks on a case by case basis for temporary housing needs (primarily temp farm worker housing).	PRMD
4.	To deliver water to the site there seem to be two options. Are we correct in thinking these options exist for builders? a. Excavate across the road to the south side of Fiscal Dr.? i. Excavation and installation costs will be ±\$20-25,000. ii. Connection costs will be ±\$17-20,000. b. Draw water from the Probation / park & maintenance department trailers location?	 A: If a new lateral is to be installed by the applicant on Fiscal Drive to serve this project, the applicant will need to obtain a City Encroachment Permit and pay applicable fees. Any proposed connection to any existing service (beyond the meter) will be under County jurisdiction. There are no water demand fees due to Santa Rosa Water for this project as the property has enough existing credits for the project as currently proposed. B: This would be under the County jurisdiction. 	City Of Santa Rosa Water

	i. Excavation and plumbing will be \pm \$2,500. If their supply is only ½" or ¾", (code requires a 1" meter and 1½" feeders) then we will need a 1,000-gallon storage tank and pressure tank & pump to hold and distribute water to use in peak load periods. An additional \pm \$3-5,000.		
5.	Rough calculations show that we will need an approximate 400A service. There is an above-ground transformer on the property line with the adjacent probation department parking are, on their side of the fence. Can we use that transformer?	The county transformers are not available for the project. It will be necessary to run independent from a PG&E connection point.	General Services
		All trenching within the county complex will need to comply with proper depths, coverages and profiles.	General Services
6.	If we have to do trenching, can we set the utilities a minimum of 12" below grade instead of the usual requirements?	Any trenching will be required to comply with local codes along with the California Plumbing Code and The California Electrical Code. 12" cover is allowed at the site but anything in the street will need to be install per local standards.	PRMD
7.	As far as the "public" accommodations for the site (to be used by its guests), if we build a communal building for showers, bathroom facilities, etc., for a group of 24 people, how many showers, unisex toilets, vanities, and/or washer dryers will you require?	This question needs clarification from submitter.	Community Development Commission
8.	Will we be required to provide Internet service?	There is nothing in the RFP which requires provision of Wi-Fi services.	Community Development Commission
9.	Since the code on bedroom size is 70 sf minimum, can we have 2 70+ sf bedrooms in a 158 sf Individual pod?	If the pod is not self-contained and relies on a communal Kitchen and/or Bath, yes. A self-contained unit (Kitchen and Bathroom) will need to comply with the California Residential Code (CRC) R304.5	PRMD
10.	If we build trailers, and they have built-in kitchenettes, can they be less than the 220 sf as prescribed in the RFP?	See above.	PRMD
11.	In an effort to reduce the cost, if we build licensed, trailer-able units on trailers, can we remove them from the trailers and set them on temporary foundations until the end of the project, when we shall remove them?	Removal would only occur after the full two year period delineated in the RFP.	Community Development Commission
12.	Will there be a height limitation on the buildings?	35ft.	PRMD
13.	Can we use 6-12 of the parking spaces in front of the lot on Fiscal Dr. for resident parking?	These spaces will need to be marked "reserved" and permits assigned by General Services, and should be part of the proposal to allow us to look at	General Services

	any impact. This parking is currently being used by Human Services employees as well as public parking for services. We should engage Human Services Administration prior to making any changes here.	
14. Is a rented perimeter cyclone fence acceptable as a perimeter fence?	TBD	
Are there any requirements for prevailing wages for this specific project, or is it cost dependent (i.e., to project cost over \$6m before County ordinance is invoked)?	Prevailing wage requirements can be connected to funding sources.	Community Development Commission
16. How does the City envision this project being processed?	See #1	City Planning
The project will require hookup(s) to City infrastructure (water and sewer). What is the City's process for approving these hookups?	Unless a new water service is requested to separately meter the domestic water usage to this project, all connections will be onsite (private) and under County jurisdiction. If a new lateral is requested to install a separate domestic meter to serve this use, a City Encroachment Permit will need to be obtained for the work associated with the installation and applicable fees paid. Meter fees and processing fees would be due and determined at the time of Encroachment Permit review.	City Of Santa Rosa Water Department
18. Will the City consider it as a regular project requiring a Utility Certificate or other mechanism?	This parcel is in the City limits and does not require a Utility Certificate	City Of Santa Rosa Water Department
19. Could the hookups be made through a simple encroachment permit process?	If new services are installed to serve this project, a City Encroachment Permit will be required and applicable fees paid to the City. If a separate sewer lateral is what the County prefers, a public sewer main extension would be required which would require Engineered plans that would need to be approved by the City (City sewer is approximately 375 feet from the proposed location of this project).	City Of Santa Rosa Water Department
	An encroachment permit would be required along with a sewer/water/electrical permit.	PRMD
Does the City anticipate that there will be any other City-required improvements beyond sewer and was hookups (upgrades to their system, additional fire hydrants, etc.)?	For water and sewer connections, Santa Rosa Water does not have any requirements unless you are requesting new services to serve this project.	City Of Santa Rosa Water Department
Will the City require that the units have fire sprinklers or will this be up to the County's Department of Emergency Services?	This will be a PRMD Building Division and City of Santa Rosa Fire Department decision.	Sonoma County Fire And Emergency Services.

22.	Does the City envision individual hookup fees for each of the potential units?	For this pilot project of 12 units, the property has enough existing water and sewer credits and no demand fees would be due to the City of Santa Rosa for the project as currently proposed	City Of Santa Rosa Water Department
233.	Full hookup fees are normally permanent. If so, would they be refunded at the end of the term? Potential options include, but are certainly not limited to: A. Up to 12 individual connections with 12 connection fees (12 individual City meters, assuming 12 units are proposed) B. 1 individual connection then manifold individual services off as necessary to serve up to 12 units, (i.e., one City lateral and meter for the entire project). This could entail a single connection fee based on the requisite lateral and meter size to serve 12 units, perhaps 1 ESD. C. Up to 12 individual connections with no connection fee (full City participation and commitment to the project). D. Up to 12 individual connections with no connection fees and then only pay for the consumed water based on the monthly meter reading(s). E. 1 individual connection with no connection fee and then only pay for the consumed water based on the monthly meter reading. F. Up to 12 individual connections with no initial connection fee(s) but defer the connection fee(s) to the end of the pilot program, should it remain. This should be discussed as part of the potential agreement with the City as we don't want any surprises at the end of the term.	Fees are not refundable once a connection to the new use is made. The fees remain as credits on the property. A new service would be required if this project proposes to install either a master domestic meter or individual meters to the project. A City Encroachment Permit would be required for the work. Fees would be as follows for meters: For a master meter, assuming a 2" meter is requested: 2" meter \$1570.00 Processing fee \$510.00 For individual meters the cost would be: 5/8" meter \$310.00 each Processing fees: \$510.00 per meter For this option, the City of Santa Rosa would require one lateral, sized large enough for all the meters, be installed. Meters (and meter boxes) would need to be in the public right of way. Backflow devices may be required per City Standards. Fees cannot be waived at the department level. It would be up to the City Council to decide whether or not fees could be waived or deferred. Fees would not be refundable at the end of the project and any services not intended to be used at the end of the project would be required to be abandoned at the main per current City Standards, under a City Encroachment Permit at the property owner's expense.	City Of Santa Rosa Water Department
24.	In the RFP it really looks like you are looking for a developer to do the whole project. That makes perfect sense, but I also think that would disqualify Rancho Cotati [High School Class] from joining in as we are not set up to work on that scale. However, we would be the perfect contributor for one or two units. I'm wondering if it is worth pursuing if we can't manage the whole project.	This determination must be made by potential submitters and it is inappropriate for agencies to opine.	Community Development Commission

Do [sic] to the temporary nature of the pilot project, and to make the project affordable to the population assisted, we would propose doing one water/sewer lateral connection that would manifold to the 12 units, with associated connection fees refunded at the end of the pilot period. Would this be a possibility?	Fees are not refundable. Based upon the current water and sewer demand fee credit for the property, there are no additional demand fees due for this project. The only fees that would be applicable to this project would be meter, processing and permit fees if a new separate service is proposed to serve this project. Fees are listed in the answer to #23.	City Of Santa Rosa Water Department
26. Has a CEQA review been completed for this project?	No. It is not anticipated CEQA will be required.	PRMD
27. If not, should a CEQA review be incorporated into our proposed scope of work and timeline?	See above	PRMD
28. What are the County's and/or City's minimum or maximum unit size requirements?	The unit size is determined by the County Zoning Ordinance and the California Building Code (CBC). 150 sq.ft. for a Single Room Occupancy (SRO) and 220sq.ft. plus a separate closet and separate bathroom for an efficiency dwelling unit. The basic difference between an efficiency dwelling unit and a single room occupancy is; an efficiency dwelling unit is a standalone dwelling with a kitchen, bathroom, living area and storage closet CRC R304.5. This type of dwelling would have its own address. A single room occupancy (SRO) is part of a congregate living facility, one address for the whole facility. PRMD anticipates most submittals will meet the definition of an SRO, Sec.26-88-125 Sonoma County Code.	PRMD
29. Are there any other unit size or type requirements?		
30. Will the City or County charge this project any fees?	TBD	PRMD
Normally here in Santa Rosa we see Impact and Building fees in excess of land costs for multi-family projects; will this be the case with this project?	See #1	City Planning
32. If fees are to be charged, what are they and how will they be calculated?	TBD	PRMD
Paragraph H of the RFP mandates consistency with the General Plan and applicable codes. What is the zoning for this property? What setbacks are required and what is the maximum density?	Zoning is Public Facilities (PF). 5ft between structures and 10ft rear yard from existing fence.	PRMD
34. Are there requirements for open space or recreational areas incorporated in the 10,000 sf?	No.	PRMD
35. What are the parking requirements?	Parking requirements will vary depending on proposal, but are not anticipated to exceed 6 total spaces for the project. It is anticipated that 6	PRMD

		spaces of the developed parking adjacent to site could be utilized for this project.	
36.	The City Building department has advised us that the normal turn around for a building permit is 3-4 months. If the Agreement is executed in April, construction documents could be delivered in June, and a permit issued in October. This would mean that the earliest [sic] occupancy would be January 2017. Is this consistent with the commission's (SCCDC) goals?	The County of Sonoma has jurisdiction. Expedited plan check would be part of this project.	PRMD
37.	Is there a possibility to fast track or streamline the permit process?	Yes.	PRMD
38.	Will the City waive impact fees, specifically parks fees, for this project?	The County of Sonoma has jurisdiction. See Questions 1 and 31.	City Of Santa Rosa Planning PRMD
39.	It is our plan to hook into the water and sewer behind the parks and recreation facilities trailer to the north of the lot. That being the case, I was wondering if we are going to have to meter either the water or the electrical side of the utilities.	Connection of the sewer will need to be made at the manhole location north of the parcel in Pauline Drive in front of the existing facilities. Pipe sizes of the existing facilities will not accommodate the added load. Water can be connected to directly south of the parcel in Fiscal Drive. A partial site plan with utility locations is attached. The City of Santa Rosa would not require a sub meter for the water connection.	General Services City Of Santa Rosa Water Department
	Verbal Questions From Januar	y 20, 2016 Pre-Bid Conference	
40.	Will there be a separate proposal request for seniors?	The RFP should encompass proposed operations and population to be served. There will not be a second RFP for an Operator.	Community Development Commission
41.	PRMD doesn't know where utilities are on property (sewer, water, electricity). Can adjacent property's sewer be tapped, i.e., the daycare center?	See Question 39. Maps for the City's public water and wastewater systems are available upon request. The City typically does not map private utilities. Water and sewer connections are not permitted to cross property lines.	General Services City Water
42.	What conversations has County had with City of Santa Rosa staff?	SCCDC, PRMD, General Services and City of Santa Rosa staff met once and have committed to ensure there is City representation on the technical Advisory Scoring Committee which will serve as the reviewing team of the	Community Development Commission

	RFPs. Also, the answers provided herein have City staff responses where appropriate.	
Given that this is a two-year program, do underground improvements need to be removed at the program's end?	If a separate water or sewer service is installed for this project and they are not be to used after the project, they would need to be abandoned per City Standards at the main under a City Encroachment Permit at the property owners expense.	City Of Santa Rosa Water Department
Do developers have to pay for utilities? [Alternate forms: Will city be asking the normal rate for connection fees if this is only a two-year project?]	Based upon the current water and sewer demand fee credit for the property, there are no additional demand fees due for this project as currently proposed. If this project wishes to have separate water and sewer services, any applicable meter, processing and permit fees would be required. Fees are listed in the answer to #23.	City Of Santa Rosa Water Department
45. Is there a topographic map, grading plan, or drainage plan available for the property?	We have included topographic plans of the site area. Grading and drainage plans will be the responsibility of the project.	General Services
46. What is the boundary of the property?	The Property boundary has not been defined.	General Services
47. What is the parcel number?	The Parcel number is the County Campus Parcel Number APN 180-030-012	General Services
48. Is there a required setback from the fence?	See Question No. 33	
49. Can existing parking be used by project?	Same answer as question 13. We will need to engage impacted departments on reduction of any spaces.	General Services
	Also, see 35 above.	PRMD
50. Do you expect the provision of parking to be a part of the proposal?	PRMD would not expect this but General Services would.	General Services PRMD
51. What criteria will there be for people to live in the project?	The RFP is designed to solicit housing type and programs to serve people who are homeless. This population is Extremely Low income under federal definition (under 30% of Average Median Income).	Community Development Commission
52. Is the project considered permanent supportive housing, for the purposes of receiving funding, if it is only expected to exist for two years?	The determination of Permanent Supportive Housing given the short duration will depend upon federal agency allowance. SCCDC will work with successful operator and HUD to determine.	Community Development Commission

53.	How do you move the project without displacing residents?	Unknown at this time. Proposers may wish to have a potential transition plan for movement at end of the two year period.	Community Development Commission
54.	Is it the contractor's responsibility to find homes for residents at the end of the program?	Yes in partnership with appropriate placement agencies.	Community Development Commission
55.	How do people with one set of skills (i.e., builders) address parts of proposal that require other skills (i.e., provision of services)?	By partnering.	Community Development Commission
56.	What qualifies a respondent to answer the social questions that are presented in the RFP?	The completeness of the response which demonstrates the ability to best find a housing solution for the intended population utilizing the small structure home model.	Community Development Commission
57.	By what metrics for success will the project be judged?	100% of residents retain safe and secure permanent housing for at least 12 months; At least 50% of residents have accessed earned income sources during their stay; At least 80% of those due entitlements benefits are receiving income from those sources (i.e. veterans benefits, disability or social security income) All these metrics are listed in detail in the <i>Building HOMES: A Policymakers Toolbox to ending homelessness</i> (pp. 40-41) which can be found online at: http://www.sonoma-county.org/cdc/pdf/housing toolbox 20150901.pdf	Community Development Commission
58.	Can the project consist of more than 8 – 12 units? Is there a density restriction? Is it based on square footage or number of units?	Per the RFP, Pg. 2, units can be between 70 and 350 Square Feet. This range combined with the need for a 10' setback from the existing cyclone fence and requirement for 5 foot separations between buildings will dictate ultimate number and density.	Community Development Commission
59.	Who is the ideal end user—single residents, families?	People who are homeless. See definition on page 2 of http://www.sonoma-county.org/cdc/pdf/housing toolbox 20150901.pdf Sheltered refers to people sleeping in emergency shelters or transitional (time limited) housing; Unsheltered refers to people sleeping in encampments, abandoned buildings, vehicles, and other outdoor areas.	Community Development Commission

60. Doesn't the inclusion of a kitchen in a unit reduce the available square footage and therefore the number of people the unit can house?	No, see CRC R304.5. See question 28	PRMD
61. How do you measure square footage, by the interior or exterior dimensions?	Exterior, except for straw bale structures (interior).	PRMD
How would this site be transitioned to a permanent site? [This question really had to do again with how funding agencies would view the project, i.e. how do you get funding for temp when it may or may not become perm]	Depending on success in both operations in meeting benchmarks enumerated in No. 57 combined with cost efficiency will determine if transition is warranted.	Community Development Commission
63. How open is the Board to making this project permanent on this site?	See above – No. 62	Community Development Commission
64. The two-year timeline makes rapid rehousing model challenging, as it is hard for residents to achieve security in temporary housing.	Correct.	Community Development Commission
Confirm that an efficiency dwelling unit is 220 sf with a kitchen, 110 sf without. Is a bathroom in addition to the 110 livable sf?	See question 28. The basic difference between an efficiency dwelling unit and a single room occupancy is; an efficiency dwelling unit is a standalone dwelling with a kitchen, bathroom, living area and storage closet CRC R304.5. This type of dwelling would have its own address. A single room occupancy (SRO) is part of a congregate living facility, one address for the whole facility. PRMD anticipates most submittals will meet the definition of an SRO, Sec.26-88-125 Sonoma County Code.	PRMD
66. How do you evaluate how well the project has been accepted by the community while this site does not have neighbors?	Community engagement even for the County campus location will need to occur to gauge neighbor response. There is a neighborhood a few hundred feet to the south.	Community Development Commission
67. Was community engagement a part of the Safe Parking project? Can we build on it for this project?	 As background, the Safe Parking projects scope of work included: Provision of technical assistance and support to enable public and private property owners to undertake safe parking on their properties; Outreach to identify and encourage property owners to participate; (emphasis added) Informational outreach to owners/residents of properties in proximity to identified safe parking sites. 	Community Development Commission

	Catholic Charities has administered this program and focused engagement efforts on identifying suitable locations. Neighborhood meetings were sporadically held in response to concerns after placement.	
68. What is the Board looking for and what do they think Tiny Homes look like?	The pilot project does not pre-suppose a type of "tiny home" and is focused on an inexpensive and effective alternative housing model. The successful project would demonstrate the health and welfare goals of helping someone be permanently housed and the financial benefits of it being less expensive than current methods of constructing and operating homeless dedicated housing.	Community Development Commission
69. Do permanent housing units require all engineering approvals?	For Type A Structures per the RFP, Pg. 3 — All structures must meet the U.S. Department of Housing and Urban Development (HUD), the California Building Code (CBC) or American National Standards Institute (ANSI) standard, as applicable. ② Structures shall be placed on appropriate foundations, and shall not be smaller than 150 square feet for individual sleeping pods that share a communal kitchen facility and/or bathroom facility, or smaller than 220 square feet for individual self-contained units (Efficiency Dwelling Units, CBC 1208.4). For Type B Structures (RFP, Pg. 4) — "Tiny Homes," Park Model homes, Recreational Vehicles and other alternative housing built on wheels must comply with ANSI standards	Community Development Commission
70. Does the builder have to be a licensed contractor?	Yes	PRMD
71. Does the builder need to be insured?	A current contractor's license would require workers compensation insurance.	PRMD
72. Is a sweat equity model permitted [asked from the perspective of insurance and licensing requirements]?	TBD	Community Development Commission
73. Are there any exceptions to building codes? [Answer was no for building codes, yes for zoning.]	The only exception is for a Single Room Occupancy unit (SRO).	PRMD
74. Will any city impact fees be waived, and how? (In particular, fees like parks fees.)	TBD	

75.	Does contractor have ultimate responsibility for running the project/programs?	The successful proposer will have both the means to construct the project and have in placer an operator of the program serving people who are housed.	Community Development Commission
76.	Containers: there are a lot of expenses when you require them to be wheeled. [Implied: Is there a way around that? Answer had to do with whether project is considered camp or permanent housing.]	The RFP denotes the choice of Type A structures (those intended for permanent use) or Type B (those intended for use in an organized camp ground. Proposers should provide costs estimates based upon which type of housing model they are pursuing.	Community Development Commission
77.	Will composting toilets be a possibility?	No.	PRMD
78.	Is the County open to alternative foundations? Can crawl space be reduced?	Sprinklers not required if 5ft. yards between and behind structures are maintained.	PRMD
79.	What are the fire suppression requirements for each unit?		
80.	Camp model doesn't require sprinklers—can this be considered a camp model?	Type B structures (RFP, Pg. 4) would be structures intended for use in an organized camp or Housing and Community Development Special Occupancy Park.	Community Development Commission
81.	Would a fire hydrant be required?	There is one at the site.	PRMD
82.	Would County consider changing the zoning ordinance to allow this on other parcels? In particular, these buildings?	Depending on the success of this pilot project, policy changes would potentially be visited.	Community Development Commission
83.	Would funding through the County General Fund be available?	Proposals should reflect total resource need. At present, there is no commitment of the County General Fund.	Community Development Commission
84.	Additionally we'd like to understand size requirements that could affect the ability of (residents) to access Continuum of Care resource or Section 8 vouchers based on a minimum size that might be part of livability standards. Clearly we need to assure access to any rental assistance and supportive services that might be available.		
	Are you able to provide information or direction on this issue?		
85.	Finally, for now, it would seem more likely to be able to access rental assistance and supportive services if this could be considered permanent housing.	This should be requested with a submitted proposals and explained as to need.	Community Development Commission

	Since the site is assured only for two years, would it be possible to consider this permeant [sic] housing with a promise from the County and the sponsors to relocate the residents, preferably with their tiny home units, but at least in alternate housing?		
	Second Round Of Developer Questions - These questions arrived after the deadline for the first round and will be answered best possible in second round.	Answer/Response	Department or Agency Responding
86	Foundation: We are looking to use "Diamond Pier" foundations which have seismic resistance capacity per the manufacturer. Will these be permitted? If so what documentation will be needed to show capability for this use?		
87	Fire Safety: Our proposed units will be of conventional wood-framed construction. What fire safety requirements (such as separation between units, number of exits (from these tiny 250-350 sf. units), etc. will be required?		
88	Setbacks: What are the required setbacks of buildings, decks, and other structures from lot lines at this site?		
89	Code Compliance: Can our designs be approved if compliant with the ICC?	,	
90	Is there an option to structure our design solution so as to meet Single Room Occupancy requirements?		